



February 10, 2016

Ms. Beth Cobert
Acting Director
U.S. Office of Personnel Management
1900 E Street, N.W.
Washington, DC 20415-1000

Dear Ms. Cobert,

The 1992 Amendments to the National Historic Preservation Act (NHPA) of 1966 (Section 112) required that the Office of Personnel Management (OPM) “revise qualification standards within 2 years of about October 30, 1992, for the disciplines involved, specifically archaeology, architecture, conservation, curation, history, landscape architecture, and planning. *Twenty-four years later, this has not been accomplished.* The Society for American Archaeology (SAA) urges a swift resolution to this longstanding problem, which has become increasingly pressing for agencies and their partners.

SAA is an international organization which, since its founding in 1934, has been dedicated to the research on and interpretation and protection of the archaeological heritage of the Americas. With over 7,900 members, SAA represents professional archaeologists in colleges and universities, museums, government agencies, and the private sector. SAA has members in all 50 states and many nations around the world.

The very pressing need for harmonization of such standards arises from both continued and newly emergent factors. Chief among these is the fact that all federal agencies are undergoing a major workforce turnover as Baby Boomers retire. An increase in hiring has pushed the lack of harmonization into a critical zone, particularly for land-managing agencies such as the Department of Agriculture, Department of the Interior, and Department of Defense.

Other important factors pressing the need for harmonization of standards include:

- In the four decades since the OPM Individual Occupational Requirements for the Archaeology Series, 0193 were issued, graduate certificate and Masters programs in cultural resource management (CRM) have grown in number and quality, producing much better qualified practitioners than existed in the 1970s and 1980s.
 - Agency standards for archaeologists, for example, those of the USDA Forest Service, have tracked with the last 40 years’ educational and field experience trends for CRM archaeologists. *Those of OPM have not.*
- Partners with federal agencies (e.g., public utilities, renewable energy developers, transportation, and construction industry) expect agency archaeologists to meet

standards typical of CRM today, *especially advanced archaeological project supervisory experience not required in OPM Archaeology Series, 0193.*

- The lack of harmonization of OPM with agency requirements risks creation of an unqualified agency workforce for dealing with project proponents, leading to *delays in implementation of Section 106 of the NHPA and other consultations.*
- Tribes, especially Tribal Historic Preservation Officers (THPOs), are sensitive to current educational and field experience trends for CRM archaeologists, many being archaeologists with such training.
 - Tribal governments tend to insist on agency, rather than OPM, standards for supervisory experience among those engaging in CRM work on tribal lands. *Lack of OPM harmonization with current standards can lead to delays in implementation of Section 106 of the NHPA, Native American Graves Protection and Repatriation Act, and other consultations.*
- Returning veterans from military service in Afghanistan, Iraq, and other theaters are entitled to 36 months' G.I. Bill benefits, including on-the-job training, to qualify for skilled positions in the national workforce.
 - Without harmonized standards, *veterans and their counselors cannot make informed choices about their training and education needs that result in their optimum employability.*
 - The lack of harmonization to current agency standards in, for example, Archaeology Series, 0193 does a grave disservice to veterans and those seeking to integrate them smoothly into America's workforce.
- SAA recommends that OPM work with National Park Service personnel who are currently revising the *Secretary of the Interior's Historic Preservation Professional Qualification Standards and Guidelines* that align with the qualifications needed in the Federal work force for archaeology and other positions related to historic preservation.

For all these reasons, SAA urges that the OPM fulfill its long-delayed harmonization mandate and specifically bring its requirements into line with those of agencies that have tracked with the last decades' educational and training trends.

This straightforward procedure, which federal agencies are eager to facilitate, would be a landmark step forward during this year's 50th Anniversary of the National Historic Preservation Act.

Sincerely yours,



Diane Gifford-Gonzalez
President

CC:

The Honorable Sally Jewell, Secretary of the Interior

The Honorable Tom Vilsack, Secretary of Agriculture

Mr. William D. Johnson, CEO, Tennessee Valley Authority

The Honorable Allison A. Hickey, Brig. Gen. USAF, Ret., Under Secretary
for Benefits, Department of Veteran's Affairs

Mr. Neil Kornze, Director, Bureau of Land Management

Dr. Jonathan Jarvis, Director, National Park Service

Mr. Dan Ashe, Director, Fish and Wildlife Service

Mr. Thomas Tidwell, Chief, Forest Service

Mr. Michael Tupper, Associate Director Resources and Planning, BLM

Dr. Stephanie Toothman, Assoc. Dir. Cultural Resources, Partnerships, and Science, NPS

Mr. Jason Weller, Chief, Natural Resources Conservation Service

Mr. Val Dolcini, Administrator, Farm Services Agency

Mr. Brandon McBride, Administrator, Rural Utilities Service